

**IN THE UNITED STATES BANKRPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
MEMPHIS DIVISION**

**IN RE**

**STANLEY RAY NEVILLES**

**SUSAN LAVETTE NEVILLES**

**DEBTORS.**

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**Case No. 19-28378**

**Chapter 13**

**Judge Jennie D. Latta**

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**RESPONSE TO DEBTORS' MOTION UNDER RULE 3002.1(e)**

**COMES NOW** U.S. Bank National Association, not in its Individual Capacity but Solely as Trustee for RMTP Trust, Series 2021 BKM-TT ("Creditor") a creditor in the above-captioned case, by and through counsel, and hereby responds to the Debtors' Motion Under Rule 3002.1(e), filed on October 7, 2022 (Doc. No. 56):

1. On September 29, 2022, Creditor filed a Notice of Postpetition Mortgage Fees, Expenses, and Charges ("Notice"), in the total amount of \$1,288.00.

2. On or about October 7, 2022, the Debtors filed the Motion Under Rule 3002.1(e) (Doc. No. 56) ("Motion"). The Motion alleges that fees and charges in the Notice should not be allowable.

3. Creditor asserts that the entirety of the fees and charges in the Notices should not be deemed unallowable and upon information and belief Creditor asserts the parties can come to an agreement in resolution of the Motion.

**WHEREFORE**, Creditor respectfully requests that the Court:

1. Grant Creditor an opportunity to be heard on the matter of the Motion;

2. Overrule the Motion; and

3. For other such relief as the Court deems just and proper.

This, the 27th day of October, 2022.

Respectfully Submitted,

By: /s/ Anne Marie Throne  
Anne Marie Throne, TNBPR 036224  
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MTG File No.: 22-000643-02

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing in the above captioned case was this day served upon the below named persons by either United States Mail or Electronic Mail at the addresses shown below:

**VIA U.S. MAIL**

Stanley Ray Nevilles  
3221 Lynchburg St.  
Memphis, TN 38134

Susan Lavette Nevilles  
3221 Lynchburg St.  
Memphis, TN 38134

**VIA CM/ECF**

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Sylvia F. Brown  
200 Jefferson Ave. Suite # 1113  
Memphis, TN 38103

Date: October 27, 2022

Respectfully Submitted,

By: /s/ Anne Marie Throne  
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